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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF TRUXTON CANYON WATER
COMPANY, INC. FOR APPROVAL OF A
RATE INCREASE.

DOCKET NO. W-02168A-11-0363

IN THE MATTER OF THE APPLICATION
OF TRUXTON CANYON WATER
COMPANY, INC. FOR APPROVAL OF A
REVISION OF THE COMPANY'S
EXISTING TERMS AND CONDITIONS OF
WATER SERVICE.

DOCKET NO. W-02168A-13-0309

IN THE MATTER OF THE APPLICATION
OF TRUXTON CANYON WATER
COMPANY, INC. FOR AUTHORITY TO
INCUR LONG-TERM DEBT.

DOCKET NO. W-02168A-13-0332

**NOTICE OF FILING DIRECT
TESTIMONY OF WES STEWART**

Intervenor Valle Vista Property Owners Association, Inc. hereby submits the
Direct Testimony of Wes Stewart in the above captioned Dockets.

RESPECTFULLY SUBMITTED this 8th day of November 2013.

FENNEMORE CRAIG, P.C.

Arizona Corporation Commission

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DOCKETED BY
EXL

By

Todd C. Wiley
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Association, Inc.

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7 1200 West Washington Street
8 Phoenix, Arizona 85007

9 A COPY of the foregoing
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11 8th day of, November 2013, to:

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7 **BEFORE THE ARIZONA CORPORATION COMMISSION**

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20
21 **DIRECT TESTIMONY OF**

22 **WES STEWART**

23
24 **November 8, 2013**
25
26

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1 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

2 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

3 A. I am testifying on behalf of Valle Vista Property Owners Association ("VVPOA")
4 in this docket. VVPOA has intervened in this case in response to Truxton Canyon
5 Water Company's substantial proposed rate increases applicable to VVPOA.

6 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY HERE?**

7 A. VVPOA intervened in this docket to protect its interests in light of the substantial
8 water rate increases proposed by Truxton. As stated in prior testimony, VVPOA
9 has been hit extremely hard by the economy, which has depleted financial reserves
10 and left VVPOA in a precarious financial position. VVPOA's cost of water for its
11 various community facilities is critical to its ongoing viability and that of the Valle
12 Vista community. Further, VVPOA intervened to ensure that Truxton would
13 charge affordable water prices to VVPOA, especially given the long prior history
14 between VVPOA and the Neal Family Trust. Because these issues are vitally
15 important to the community, VVPOA requests that the Commission consider the
16 recommendations set forth below in the best interests of residential homeowners
17 and utility customers in Valle Vista. The simple reality is that VVPOA can't
18 afford to pay the rate increases requested by Truxton.

19 **II. SUMMARY OF VALLE VISTA PROPERTY OWNERS ASSOCIATION.**

20 **Q. BEFORE ADDRESSING TRUXTON'S RATE APPLICATION, LET'S**
21 **TALK ABOUT THE HISTORY OF THE VALLE VISTA COMMUNITY.**
22 **CAN YOU TELL US ABOUT THE VALLE VISTA DEVELOPMENT?**

23 A. The Valle Vista development is a planned community with approximately 4,300
24 lots and 891 improved lots (some homes are built on two lots). Valle Vista is
25 located about 15 miles northeast of Kingman, just off Historic Route 66. Valle
26

1 Vista is located within Truxton's CC&N area. Valle Vista has a golf course, park,
2 tennis court and swimming pool, along with other recreational amenities.

3 **Q. IS VALLE VISTA A KEY PART OF THE COMMUNITY?**

4 A. Yes, absolutely. Those facilities and amenities are center pieces of the community
5 and are a prime selling point for the community and its residents. Specifically, the
6 Valle Vista community park houses a pool, tennis court, basketball court and kids
7 playground. The Valle Vista golf course lies within the community of Valle Vista
8 with over 4,300 available home sites. Valle Vista would not be able to sustain its
9 amenities if it weren't for the revenue derived from its assessments as well as
10 revenue from the golf course. VVPOA, a non-profit corporation, has operated
11 many years in the red.

12 **Q. PLEASE EXPLAIN HOW VVPOA OPERATES AND WHO IT**
13 **REPRESENTS?**

14 A. VVPOA is a non-profit corporation acting as the property owners association for
15 the Valle Vista development. The membership of VVPOA is comprised strictly of
16 property owners in Valle Vista, including most of Truxton's residential water
17 customers. The current officers for VVPOA are Barry Van Stockum (President),
18 Elaine Hible (Vice President), and Marisa McClain (Secretary). I am the Treasurer
19 and took office in November 2012. The VVPOA Board of Directors includes
20 those officers and the following persons: Roger Ciciarelli, Christine Meisenheimer
21 and Sue Wilkin. VVPOA is community operated and owned. VVPOA, through
22 its predecessor, was incorporated in 1972.

23 **Q. HOW DOES VVPOA'S STATUS AS A NON-PROFIT PROPERTY**
24 **OWNERS ASSOCIATION IMPACT ITS ABILITY TO ABSORB**
25 **INCREASED WATER RATES?**

1 A. Significantly. Because we are community owned and operated, any cost increases
2 imposed on VVPOA ultimately fall on its residential property owners (*i.e.*,
3 Truxton's residential customers) through either (1) increased assessments, fees or
4 prices for services provided by VVPOA, including operation of the golf course or
5 (2) a drastic reduction in operation of the golf course and related amenities. In
6 fact, in prior testimony, Truxton's Rick Neal testified regarding the impacts of
7 making VVPOA a customer of Truxton: "[t]he Trust has been serving the golf
8 course for approximately 40 years. Requiring Valle Vista Property Owners
9 association to pay the tariff rates for Golf Course water will likely lead to the golf
10 course turf to go without water and die. The Golf Course will stop operating and
11 the community will suffer an extremely adverse impact and their property values
12 will fall drastically."¹ Commission Staff also expressed a similar concern relating
13 to VVPOA's ability to pay Truxton's full tariff rates: "The Golf Course is very
14 concerned that it will be unable to purchase water for its operations at Truxton's
15 current rate of \$2.50 per 1000 gallons, per Decision No. 63713 dated June 6, 2001.
16 Staff finds it necessary for the Commission to authorize Truxton to charge the Golf
17 Course the Agreement's prevailing rate of approximately \$1.1437 per 1,000-
18 gallons plus applicable tax rates ("Golf Course Rate")."² We currently run our
19 golf course with a limited staff due to our financial situation. A normal golf
20 course would require a staff of ten to twelve full time employees; we currently
21 have four. Our other staffing is a bare minimum for all departments. Our office
22 staff is made of two full time employees and one part time employee with the
23

24 ¹ Rebuttal Testimony ("RB") of R. Neal dated December 10, 2010 at 4, Docket No. 10-
25 0247.

26 ² Surrebuttal Testimony ("SRB") of A. Igwe dated December 23, 2010 at 8-9, Docket No.
10-0247.

1 remainder being volunteers. We have continually looked for ways to cut our
2 operations costs due to the pending rate case.

3 **Q. CAN VVPOA SIMPLY PASS THE WATER RATE INCREASES ON TO**
4 **ITS PROPERTY OWNERS THROUGH ASSESSMENTS?**

5 A. No, it's not as simple as that. Under our bylaws, VVPOA sends out assessments to
6 each property owners at the end of our fiscal year, which is April 30. Property
7 owners currently pay \$124 for each unimproved property and \$236 for each
8 improved property within the development. If we were faced with an exorbitant
9 water rate increase such as that proposed by Truxton, VVPOA would have no
10 choice but to attempt to pass those costs on to property owners through increased
11 assessments. We can't increase golf course fees or pool fees because people
12 simply won't pay the increased prices. Unfortunately, however, VVPOA's by-
13 laws enacted in 1972 require approval of a 66% super-majority before any major
14 changes can be made, such as changing our 501.c.7. status to a 501.c.3 or to
15 rewrite or abolish our restrictive by-laws. Any increases in assessments requires a
16 majority of the minimum 10% of lots in good standing according to our current by-
17 laws. In elections in the past eight years, we have averaged 27% annually of
18 qualified lots voted and in 2013 only 13% voted. Modest increases have been
19 defeated in the past by two to one margins. As a practical matter, we barely have
20 enough property owners voting to constitute a quorum. As a result, it is highly
21 unlikely that VVPOA will be able to pass any increased water rates on to its
22 property owners through an increased assessment. It remains extremely difficult to
23 get a majority of the qualified property owners willing to even entertain a rate
24 increase. There have been previous boards that have tried to get our assessments
25 increased with no results. There is a large majority of our vacant lots that has been
26 assigned to the State of Arizona for back taxes. In these tough economic times, it

1 remains a challenge to maintain what we currently have. The media coverage
2 concerning Truxton's ongoing problems with its arsenic levels has directly
3 affected the ability to attract new residents.

4 **Q. WHAT WOULD HAPPEN IF TRUXTON'S PROPOSED RATE**
5 **INCREASES GO INTO EFFECT AND VVPOA CAN'T MAKE UP THAT**
6 **REVENUE SHORTFALL?**

7 A. For starters, the golf course and related amenities would not be able to stay in
8 business. In May 2013, VVPOA proposed a 2013-14 budget of revenues equaling
9 \$1,247,385 with expenses totaling \$1,253,466, for a loss of \$6,077. This is
10 basically a break even budget. Losses are always incurred in the months of high
11 water usage and positive results in the months of lesser water usage. For example
12 VVPOA has a year to date loss of \$67,373 as of September 30, 2013. I have
13 attached as Exhibit A spreadsheets showing the total cost of Truxton's proposed
14 rate increases based on VVPOA's water use in 2012. Based on 2012 usage, that
15 total cost would be \$354,424.80, a significant increase in water costs for VVPOA.
16 In its rate application, Truxton suggests an estimated amount of \$240,000 for golf
17 course water usage.³ In reality, however, the actual water costs are likely to be
18 much higher for VVPOA. Attached Exhibit A illustrates that using VVPOA's
19 proposed rates of \$1.70/\$1.90 per 1,000 gallons will yield approximately
20 \$254,936.10 in revenue from VVPOA. Again, VVPOA simply cannot afford a
21 nearly \$100,000 cost increase for water.

22 **Q. CAN YOU DESCRIBE FOR US THE PRIOR DEALINGS BETWEEN**
23 **VVPOA AND THE CLAUDE K. NEAL FAMILY TRUST?**
24
25

26 ³ Truxton Rate Application, Schedule C-2a.

1 A. VVPOA has a long history with the Claude K. Neal Family Trust, which has
2 provided irrigation water to Valle Vista since 1972. The Trust is the principal
3 shareholder and owner of Truxton Canyon Water Company. Originally, the Neal
4 family came to the aid of the community and helped sustain the development by
5 providing water to the golf course. The original contract rate was \$0.7213 per
6 1,000 gallons and the parties have been entering five year option periods for many
7 years. On April 24, 2002, VVPOA entered an Agreement with the Trust for
8 irrigation water. Under that Agreement, an option/renewal clause for an additional
9 5 years was made part of that Agreement. In December of 2006 the additional five
10 year renewal clause was optioned and put into place. That Agreement between
11 VVPOA and the Trust expired on December 31, 2011. Under Decision No. 72386
12 issued by the Commission on May 27, 2011, VVPOA became a customer of
13 Truxton. Under Decision No. 72724 issued on January 6, 2012 in Docket No. W-
14 02168A-10-0247, the Commission entered an interim commodity rate applicable to
15 VVPOA of \$1.45 per 1,000 gallons.

16 **Q. WHAT HAPPENED NEXT?**

17 A. In March, April and May, 2012, representatives of Truxton and VVPOA entered
18 settlement discussions in an effort to mutually resolve Truxton's requested rate
19 increases applicable to VVPOA. The parties engaged in good faith settlement
20 discussions to reach agreement on acceptable commodity rates and other terms that
21 would apply to water services provided by Truxton to VVPOA. Truxton and
22 VVPOA agreed to the following commodity rates per 1,000 gallons of water
23 provided to VVPOA for all water provided and delivered to VVPOA through its
24 existing 3/4", 2", 4" and 6" meters. For 0-15,000,000 gallons of water delivered
25 each month, Truxton shall charge the rate of \$1.70 per 1,000 gallons. For over
26 15,000,000 gallons of water, Truxton shall charge the rate of \$1.90 per 1,000

1 gallons. That is what Truxton currently charges VVPOA for water service. As
2 part of the agreement VVPOA has been paying a rate of \$1.45/1000 gallons with a
3 "true-up" to the agreed upon rate of 1.70/1.90 once the rate is approved. VVPOA
4 has \$40,000 on deposit with Truxton to be used for the "true-up."

5 **Q. WHY HAS VVPOA INTERVENED IN THIS RATE CASE?**

6 A. VVPOA has a substantial interest in this docket because it is a major water user
7 and customer of Truxton, and Truxton has proposed to substantially increase
8 VVPOA's rates for water service. As noted above, Valle Vista is located within
9 Truxton's CC&N area for water service. VVPOA is a substantial water customer
10 of Truxton and is Truxton's most significant water customer. Valle Vista has a
11 golf course, park, tennis court and swimming pool, along with other recreational
12 amenities. Those facilities and amenities are center pieces of the community and
13 are a prime selling point for the community and its residents. The rate application
14 filed by Truxton in this docket proposes substantial rate increases for VVPOA as a
15 customer of Truxton. Any cost increases imposed on VVPOA ultimately would
16 fall on VVPOA's residential property owners (*i.e.*, Truxton's residential
17 customers) through increased assessments, fees or prices for services provided by
18 VVPOA, including operation of the golf course, park and pool. As such, the rates
19 to be charged by Truxton for water service to VVPOA materially affect VVPOA's
20 operations, the Valle Vista Development and the interests of Truxton's residential
21 customers. The purpose of VVPOA's intervention is to address Truxton's
22 proposed rate increases and the impacts of those rate increases on VVPOA and
23 residential customers in the Valle Vista Development. The water rate increases
24 proposed by Truxton will have a substantial negative impact on VVPOA and the
25 Valle Vista community.
26

1 **Q. PLEASE EXPLAIN.**

2 A. As stated in prior dockets, VVPOA has been hit extremely hard by the economy,
3 which has depleted financial reserves and left VVPOA in a precarious financial
4 position. VVPOA's cost of water for its various community facilities is critical to
5 its ongoing viability and that of the Valle Vista community. It is important for the
6 Commission to understand VVPOA's financial situation. VVPOA's fiscal year
7 runs May1-April 31. VVPOA collects its primary revenue at two times during the
8 year—renewal of golf membership fees in December and property owner
9 assessments in April-June. As a result, VVPOA is dependent on those sources of
10 revenue and must budget those funds for operation of the golf course, swimming
11 pool and other amenities during the entire year. Normally an association like
12 VVPOA maintains a reserve account of at least \$100,000-150,000 for unexpected
13 and unbudgeted repairs and other items. For the last several years, VVPOA has
14 operated on a shoe-string budget without any reserve account.

15 **Q. PLEASE DESCRIBE VVPOA'S OPERATING EXPENSES?**

16 A. VVPOA's operating expenses average approximately \$85-90,000 per month.
17 Based on the timing of the revenue collections noted above, VVPOA experiences
18 several months during the year where revenue is far exceeded by expenses. In
19 2010, VVPOA spent \$26,000 more than budget, despite cutting operating expenses
20 by \$33,000. Even worse, revenue in 2010 was \$1,298,644, but revenue in 2011
21 was \$1,139,360, a decline of \$159,284.00. Even with a modest property owners
22 dues increase, revenues remained flat in 2012 and 2013. Revenues were
23 \$1,188,494 in 2012 and \$1,194,966 in 2013. VVPOA has been able to continue
24 operations only by maintaining tight controls over costs and expenses. That
25 includes water conservation for the golf course.

26

1 Q. DESCRIBE VVPOA'S BUDGET AND OPERATIONS IN 2012-2013.

2 A. In the fiscal year of 2012-13, VVPOA had excess revenues over expenses by
3 \$25,388. That was entirely the result of cost savings from budget.

4 Q. DOES VVPOA HAVE ANY CAPITAL RESERVE IN ITS BUDGET FOR
5 SYSTEM IMPROVEMENTS OR OTHER EXPENDITURES?

6 A. VVPOA has no reserves for capital improvements and has not had any for a
7 number of years. Upgrades in systems and equipment have to be absorbed into the
8 operating budget.

9 III. THE COMMISSION SHOULD REJECT THE PROPOSED RATE
10 INCREASES APPLICABLE TO VVPOA.

11 Q. HOW WILL THE PROPOSED RATE INCREASES AFFECT VVPOA?

12 A. As noted in its application, Truxton has proposed to reduce rates for residential
13 customers while it dramatically increases the rates and revenue from commercial
14 customers like VVPOA. Truxton's demands for such significant price increases
15 have placed VVPOA on the precipice of financial disaster. Because these issues
16 are vitally important to the community, VVPOA requests that the Commission
17 consider the recommendations set forth below in the best interests of residential
18 homeowners and customers in Valle Vista. VVPOA obtains irrigation water
19 service through one 3/4" meter, two 2" meters, one 4" meter and one 6" meter. As
20 such, the rate increases proposed by Truxton will dramatically and materially
21 impact VVPOA's operations, the Valle Vista development and residential property
22 owners. VVPOA simply can't afford to pay any rate increases beyond the \$1.70
23 and \$1.90 rates under the interim settlement agreement with Truxton. What is
24 even more precarious is that if Truxton imposes such significant rate increases,
25 VVPOA may have no choice but to reduce or cease operations, in turn leaving a
26 significant revenue shortfall for Truxton. As noted in prior testimony by both

1 Commission Staff and Truxton, it is critical to set rates for VVPOA to allow
2 VVPOA to continue operation while continuing to exist as Truxton's biggest water
3 customer and avoid placing that burden entirely on residential customers.

4 **Q. WHAT RATES DOES TRUXTON PROPOSE FOR VVPOA?**

5 A. In its rate filing, Truxton seeks to increase VVPOA's commodity rate from
6 \$1.70/1000 gallons for the first 15,000,000 gallons of water substantially. For
7 VVPOA's 3/4" meter, Truxton proposes \$1.00 for 1-3,000 gallons, \$1.51 for
8 3,001-10,000 gallons and \$2.50 for over 10,000 gallons. For VVPOA's 2" meters,
9 Truxton proposes \$1.51 for 1-80,000 gallons and \$2.50 for over 80,000 gallons.
10 For VVPOA's 4" meter, Truxton proposes \$1.51 for 0-250,000 gallons and \$2.50
11 for over 250,000 gallons. Finally, for the 6" meters, Truxton proposes \$1.51 for 0-
12 500,000 gallons and \$2.50 for over 500,000 gallons. Based on 2012 water usage,
13 VVPOA would be forced to pay \$354,424.80 as opposed to \$254,936.10 as with
14 the agreed upon rates of \$1.70/\$1.90.

15 **Q. HOW MUCH WATER DOES VVPOA USE?**

16 A. Attached Exhibit B has been prepared detailing water usage by VVPOA for 2012
17 and 2013. As noted below, VVPOA has made operational changes in an effort to
18 minimize water usage, but the golf course and related amenities are focal points of
19 the Valle Vista Development. It is critical to support their continued operation in
20 the best interest of property owners and water customers in the community.

21 **Q. HAS VVPOA MADE EFFORTS TO MINIMIZE ITS WATER USE?**

22 A. Absolutely. We have continued over the last three years to use less and less water
23 for the golf course. Over the last winter, we installed much needed shut-off valves
24 on the back nine to reduce the amount of water loss due to breaking main line
25 pipes that are thirty years old. In the past, the entire system had to be drained to
26 repair such lines, wasting water because of the system in place.

1 **Q. HOW MUCH WILL VVPOA'S WATER COSTS INCREASE UNDER**
2 **TRUXTON'S PROPOSED RATES?**

3 A. Not counting meter charges and applicable taxes, VVPOA would be required to
4 pay nearly \$100,000 per year above and beyond the \$1.70/\$1.90 agreed upon rates.

5 **Q. CAN VVPOA AFFORD TO PAY THOSE INCREASE WATER BILLS?**

6 A. NO. An approximately 40% increase in irrigation costs translates to a 10%
7 increase in total operating costs for VVPOA. There are not sufficient revenues or
8 opportunities for expense cuts to absorb such an increase. Golf course operations
9 would be severely impacted, in turn decreasing revenues for Truxton even further
10 and degrading the quality of life for the Valle Vista community.

11 **Q. DOES VVPOA HAVE AN ALTERNATIVE RATE PROPOSAL?**

12 A. Yes, VVPOA proposes that the Commission approve a permanent rate for VVPOA
13 set at \$1.70/1000 gallons for the first 15,000,000 gallons per month provided to
14 VVPOA (across all of its meters) and \$1.90 per 1,000 gallons for any amounts
15 above 15,000,000 gallons (again, across all of its meters). VVPOA believes it can
16 afford to pay those rates. Since the beginning of 2012, VVPOA has maintained its
17 ability to pay the \$1.70/\$1.90 permanent rate.

18 **Q. WHAT WILL HAPPEN IF THE COMMISSION APPROVES HIGHER**
19 **RATES AS PROPOSED BY TRUXTON?**

20 A. We would be forced to shut down the golf course. VVPOA would no longer exist
21 as it is now, and the financial ramifications that VVPOA would incur, we would
22 not likely recover from. I also would note that if VVPOA ceased operations, then
23 Truxton would lose its biggest water customer and the lost revenue would have to
24 be made up by residential customers.

25 **Q. HAS TRUXTON PROVIDED ANY SUPPORT FOR ITS PROPOSED RATE**
26 **INCREASES APPLICABLE TO VVPOA?**

1 A. No, we do not believe so. In its filing, Truxton did not provide any cost of service
2 study or other justification supporting such increased tariff rates for VVPOA.
3 Truxton did not even bother to explain its proposed tariff rate for VVPOA, let
4 alone substantiate it. Under the prior agreements, the Neal Family Trust provided
5 water to VVPOA for many, many years at substantially lower rates. The water
6 system is a gravity feed system and VVPOA does not believe it should bear the
7 brunt of the rate increases proposed by Truxton. It also should be noted that
8 VVPOA is owned by property owners in Valle Vista. VVPOA is a non-profit
9 property owner's association. Thus, Truxton's attempt to place the lion's share of
10 the financial burden on VVPOA simply places that burden on the individual
11 property owners through the back door. Under these circumstances, Truxton's
12 proposed commodity rates for VVPOA should be rejected as unsupported and in
13 excess of Truxton's actual costs of providing service to VVPOA. Rather than
14 allowing a utility to arbitrarily set a commodity rate without any justification, the
15 Commission should set VVPOA's rate based on cost of service, a point
16 acknowledged by Chief Counsel for the Commission at the August 16, 2011 open
17 meeting.⁴ Here, the existing record is replete with evidence relating to Truxton's
18 costs of providing service to VVPOA, which is substantially below its proposed
19 rates. For example, on September 1, 2010, the Trust and Truxton entered a "Water
20 Supply Agreement for Truxton Canyon Water Company." Paragraph 7 of that
21 Agreement establishes Truxton's cost of purchasing water for its customers,
22
23

24 ⁴ See also Principles of Water Rates, Fees and Charges, Manual of Water Supply
25 Practices, American Water Works Association (5th Ed. 2000) at p. 49 ("The basic premise
26 in establishing adequate rate schedules that are equitable to different customers is that
rates should reflect the cost of providing water service.")

1 including VVPOA. At \$1.01 per 1,000 gallons delivered. Truxton's attempt to
2 now charge \$1.51 and \$2.50 per 1,000 gallons should be rejected.

3 **Q. CAN VVPOA LIVE WITH \$1.70/\$1.90 AS THE FINAL RATES?**

4 A. Yes, but VVPOA cannot afford to pay more than that. At 139,000,000 gallons of
5 water provided to VVPOA, Truxton would incur \$354,424.80 in water costs at
6 Truxton's proposed rates. Truxton's proposed commodity rates and rate structure
7 should be rejected as unreasonable and unjust for VVPOA. Such rate will put
8 VVPOA on the financial brink. Assuming that VVPOA uses 139 million gallons
9 per year, Truxton's proposed tariff would result in \$15,456 in minimum monthly
10 charges, plus \$338,968.80 in commodity charges, which would total \$354,424.80,
11 not including state sales taxes. VVPOA and its property owners simply cannot
12 afford such price increases.

13 **Q. ARE THERE OTHER REASONS TO REJECT THE RATE INCREASES?**

14 A. Yes, over the course of VVPOA purchasing water from Truxton, VVPOA has
15 continually lost revenue due to Truxton's failing infrastructure. Most of these
16 failures have taken place during the hot Arizona summer months in which our
17 revenue was lost due to our golf course burning up due to no water. In 2011, we
18 went 30 days without watering the course due to Truxton breakdowns. These
19 breakdowns seem to always happen at critical times with the same infrastructure.
20 Therefore, we have to use more water just to keep our course alive. It has taken
21 nearly two years for the golf course to recover. The Commission should reject
22 Truxton's attempts to increase VVPOA's rates so substantially for the simple
23 reason that the Trust and Truxton have failed to provide adequate water service to
24 VVPOA in July, August and September 2011. In July 2011, two of the Trust's
25 wells in the Hackberry Well Field and the Valley Well, which is used to provide
26 sufficient or adequate water service to VVPOA during the summer, failed and

1 went out of service. The outages occurred again in August 2011. As a result, the
2 Trust failed to provide water service to VVPOA for a period of several weeks in
3 July and August 2011, which caused substantial harms to VVPOA. To make
4 matters worse, Truxton and the Trust again failed to provide water to VVPOA
5 from September 2-7, 2011 (the Valley Well went out of service again).
6 Additionally, VVPOA was without adequate water service for a total of 23 days in
7 2012, including one stretch of 10 days straight and for 29 days in 2013 with a 21
8 day stretch in April which again caused stress to the golf course, park and pool.
9 The Valley well was involved in the two long stretches when water was not
10 adequately available.

11 **IV. ADOPTING TRUXTON'S PROPOSED RATES WOULD NOT SERVE THE**
12 **PUBLIC INTEREST.**

13 **Q. WOULD THE PUBLIC BENEFIT FROM PLACING THE FINANCIAL**
14 **BURDENS OF THE RATE INCREASES ON VVPOA?**

15 A. Absolutely not. Under these circumstances, it is critical that VVPOA's commodity
16 rate be set at a level that will allow VVPOA to continue operations. In no
17 uncertain terms, VVPOA is a significant revenue source for Truxton—a fact
18 previously noted by Truxton's Rick Neal. As such, it is critical that the
19 Commission set VVPOA's rates at a level that will allow VVPOA to continue
20 operations and provide revenue for Truxton. VVPOA simply wouldn't have any
21 way of paying for the exorbitant rate increases requested by Truxton, other than
22 curtailing or ceasing operations. VVPOA would no longer be a golf community,
23 placing the burden on its homeowners and their property values.

24 **Q. COULD VVOA SIMPLY INCREASE ITS PROPERTY ASSESSMENTS TO**
25 **COVER THE WATER RATE INCREASES?**

26 A. As noted above, the restrictive CL&Rs for Valle Vista will not let that happen.

- 1 Q. DOES VVPOA HAVE ANY COMMENTS RELATING TO THE
2 MONTHLY METER CHARGES PROPOSED BY TRUXTON?
- 3 A. In its proposed interim tariff, Truxton seeks to impose on VVPOA the charge of
4 \$1,288 per month as monthly usage charges for the 3/4", the two 2", the 4" and the
5 6" meters. That proposed charge is unjust and unreasonable. VVPOA currently
6 uses five meters for irrigation water service from the Trust (and now Truxton)—a
7 6" meter that supplies the golf course on the #8 fairway, a 4" meter that supplies
8 VVPOA's 500,000 gallon storage tank, a 2" meter that provides irrigation to
9 VVPOA's front entrance, a 2" meter that supplies the community park and pool
10 and a 3/4" meter that provides irrigation for certain plant areas. The Trust did not
11 charge VVPOA any monthly meter or minimum charges for water service.
- 12 Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY SUBMITTED BY
13 MS. SONN ROWELL ON BEHALF OF TRUXTON?
- 14 A. Yes, I have reviewed Truxton's rate application and testimony of Ms. Rowell.
- 15 Q. DO YOU AGREE WITH MR. ROWELL'S TESTIMONY AND
16 RECOMMENDATIONS IN THIS CASE?
- 17 A. No, VVPOA opposes the proposed rate increases suggested by Truxton and Ms.
18 Rowell in her testimony for the reasons noted in my testimony here.
- 19 V. TRUXTON'S FINANCING APPLICATION.
- 20 Q. NOW, ARE YOU AWARE THAT TRUXTON SEEKS APPROVAL OF
21 FINANCING FOR AN ARSENIC TREATMENT FACILITY AND
22 PURCHASE OF ASSETS FROM THE NEAL FAMILY TRUST?
- 23 A. Yes.
- 24 Q. WHAT IS VVPOA'S POSITION RELATING TO TRUXTON'S
25 FINANCING APPLICATION?
- 26

1 A. Truxton seeks Commission approval for \$1,819,208 in financing for the cost of
2 acquiring and installing plant to treat and blend water to resolve arsenic
3 compliance issues, along with the acquisition of wells and transmission lines
4 currently owned by the Neal Family Trust. VVPOA does not believe it should pay
5 for the costs of arsenic treatment. VVPOA uses bulk irrigation water. As a result,
6 it is not fair for VVPOA to pay for arsenic treatment when VVPOA is using non-
7 potable irrigation water. VVPOA supports Truxton's attempts to build an arsenic
8 treatment system and believes such system is in the public interest of Truxton's
9 customers. Even so, arsenic treatment is not necessary for the non-potable water
10 service provided to VVPOA. The arsenic levels do not directly affect irrigation of
11 the golf course.

12 **Q. WHAT ABOUT FINANCING FOR TRUXTON'S PURCHASE OF THE**
13 **WELLS AND TRANSMISSION LINES OWNED BY THE TRUST?**

14 A. VVPOA also believes that it and customers should not pay any increased rates for
15 Truxton's acquisition of the wells and transmission lines owned by the Neal
16 Family Trust. The Neal Family Trust used those facilities to sell bulk water to
17 VVPOA for many, many years and we believe that the Trust has more than earned
18 its money back. It also is unclear exactly how much financing applies to those
19 facilities as opposed to the arsenic treatment facilities. Given that the Neal Family
20 Trust is the sole shareholder of Truxton, neither VVPOA nor water customers
21 should pay any increased rates or charges applicable to Truxton purchasing those
22 assets from the Trust.

23 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

24 A. Yes.
25
26

EXHIBIT A

WPOA TOTAL CHARGES UNDER TRUXTON PROPOSED RATES (BASED ON 2012 USAGE)

	6" Main	4" Aux	2" P&P	2" Ent	3/4" Ole	Totals
Jan	\$4,072.50	\$350.00	\$125.29	\$112.00	\$14.00	\$4,673.79
Feb	\$10,862.50	\$350.00	\$367.30	\$167.87	\$14.00	\$11,761.67
March	\$16,835.00	\$350.00	\$455.05	\$117.59	\$14.00	\$17,771.64
Apr	\$19,702.50	\$652.00	\$649.30	\$345.30	\$14.00	\$21,363.10
May	\$27,735.25	\$14,018.75	\$1,237.05	\$525.30	\$14.79	\$43,531.14
June	\$35,976.50	\$21,980.00	\$2,287.30	\$350.30	\$14.67	\$60,608.77
July	\$30,166.00	\$17,874.75	\$2,446.55	\$715.30	\$15.07	\$51,217.67
Aug	\$32,949.25	\$9,322.25	\$2,421.55	\$372.80	\$14.68	\$45,080.53
Sept	\$34,332.50	\$1,488.50	\$2,061.30	\$312.80	\$14.58	\$38,209.68
Oct	\$36,405.25	\$1,622.00	\$2,569.80	\$121.06	\$15.17	\$40,733.28
Nov	\$12,058.50	\$350.00	\$425.55	\$145.22	\$14.00	\$12,993.27
Dec	\$5,882.75	\$350.00	\$121.51	\$112.00	\$14.00	\$6,480.26
TOTALS	\$266,978.50	\$68,708.25	\$15,167.55	\$3,397.54	\$172.96	\$354,424.80

WPOA TOTAL CHARGES UNDER EXISTING RATES (BASED ON 2012 USAGE)

	All Meters
Jan	\$3,847.87
Feb	\$8,740.81
March	\$12,805.68
Apr	\$15,094.22
May	\$30,992.86
June	\$43,971.73
July	\$36,834.96
Aug	\$32,169.34
Sept	\$27,025.95
Oct	\$28,811.25
Nov	\$9,567.35
Dec	\$5,074.08
Total	\$254,936.10

6" WATER MAIN CHARGES BASED ON TRUXTON PROPOSED RATES (2012 WATER USAGE)

	6" Main	Truxton Proposed Rates			Usage Charge	Totals
January	1,547,000	500	\$1.51	\$755.00		
		1,047	\$2.50	\$2,617.50		
		Monthly Total			\$700	\$4,072.50
February	4,263,000	500	\$1.51	\$755.00		
		3,763	\$2.50	\$9,407.50		
		Monthly Total			\$700	\$10,862.50
March	6,652,000	500	\$1.51	\$755.00		
		6,152	\$2.50	\$15,380.00		
		Monthly Total			\$700	\$16,835.00
April	7,799,000	500	\$1.51	\$755.00		
		7,299	\$2.50	\$18,247.50		
		Monthly Total			\$700	\$19,702.50
May	11,012,100	500	\$1.51	\$755.00		
		10,512	\$2.50	\$26,280.25		
		Monthly Total			\$700	\$27,735.25
June	14,308,600	500	\$1.51	\$755.00		
		13,809	\$2.50	\$34,521.50		
		Monthly Total			\$700	\$35,976.50
July	11,984,400	500	\$1.51	\$755.00		
		11,484	\$2.50	\$28,711.00		
		Monthly Total			\$700	\$30,166.00
August	13,097,700	500	\$1.51	\$755.00		
		12,598	\$2.50	\$31,494.25		
		Monthly Total			\$700	\$32,949.25
September	13,651,000	500	\$1.51	\$755.00		
		13,151	\$2.50	\$32,877.50		
		Monthly Total			\$700	\$34,332.50
October	14,480,100	500	\$1.51	\$755.00		
		13,980	\$2.50	\$34,950.25		
		Monthly Total			\$700	\$36,405.25
November	4,741,400	500	\$1.51	\$755.00		
		4,241	\$2.50	\$10,603.50		
		Monthly Total			\$700	\$12,058.50
December	2,271,100	500	\$1.51	\$755.00		
		1,771	\$2.50	\$4,427.75		
		Monthly Total			\$700	\$5,882.75
		Yearly Total			\$8,400	\$266,978.50

4" AUX CHARGES BASED ON TRUXTON PROPOSED RATES (2012 WATER USAGE)

	4" Aux	Truxton Proposed Rates			Usage Charge	Totals
January	0	0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$350	\$350.00
February	0	0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$350	\$350.00
March	0	0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$350	\$350.00
April	200	200	\$1.51	\$302.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$350	\$652.00
May	5,566,500	250	\$1.51	\$377.50		
		5,317	\$2.50	\$13,291.25		
		Monthly Total			\$350	\$14,018.75
June	8,751,000	250	\$1.51	\$377.50		
		8,501	\$2.50	\$21,252.50		
		Monthly Total			\$350	\$21,980.00
July	7,108,900	250	\$1.51	\$377.50		
		6,859	\$2.50	\$17,147.25		
		Monthly Total			\$350	\$17,874.75
August	3,687,900	250	\$1.51	\$377.50		
		3,438	\$2.50	\$8,594.75		
		Monthly Total			\$350	\$9,322.25
September	554,400	250	\$1.51	\$377.50		
		304	\$2.50	\$761.00		
		Monthly Total			\$350	\$1,488.50
October	607,800	250	\$1.51	\$377.50		
		358	\$2.50	\$894.50		
		Monthly Total			\$350	\$1,622.00
November	0	0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$350	\$350.00
December	0	0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$350	\$350.00
		Yearly Total			\$4,200	\$68,708.25

2" P&P CHARGES BASED ON TRUXTON PROPOSED RATES (2012 WATER USAGE)

	2" P&P	Truxton Proposed Rates			Usage Charge	Totals
January	8,800	8.8	\$1.51	\$13.29		
		0	\$2.50	\$0.00		
		Monthly Total		\$13.29	\$112	\$125.29
February	133,800	80	\$1.51	\$120.80		
		54	\$2.50	\$134.50		
		Monthly Total		\$255.30	\$112	\$367.30
March	168,900	80	\$1.51	\$120.80		
		89	\$2.50	\$222.25		
		Monthly Total		\$343.05	\$112	\$455.05
April	246,600	80	\$1.51	\$120.80		
		167	\$2.50	\$416.50		
		Monthly Total		\$537.30	\$112	\$649.30
May	481,700	80	\$1.51	\$120.80		
		402	\$2.50	\$1,004.25		
		Monthly Total		\$1,125.05	\$112	\$1,237.05
June	901,800	80	\$1.51	\$120.80		
		822	\$2.50	\$2,054.50		
		Monthly Total		\$2,175.30	\$112	\$2,287.30
July	965,500	80	\$1.51	\$120.80		
		886	\$2.50	\$2,213.75		
		Monthly Total		\$2,334.55	\$112	\$2,446.55
August	955,500	80	\$1.51	\$120.80		
		876	\$2.50	\$2,188.75		
		Monthly Total		\$2,309.55	\$112	\$2,421.55
September	811,400	80	\$1.51	\$120.80		
		731	\$2.50	\$1,828.50		
		Monthly Total		\$1,949.30	\$112	\$2,061.30
October	1,014,800	80	\$1.51	\$120.80		
		935	\$2.50	\$2,337.00		
		Monthly Total		\$2,457.80	\$112	\$2,569.80
November	157,100	80	\$1.51	\$120.80		
		77	\$2.50	\$192.75		
		Monthly Total		\$313.55	\$112	\$425.55
December	6,300	6.3	\$1.51	\$9.51		
		0	\$2.50	\$0.00		
		Monthly Total		\$9.51	\$112	\$121.51
		Yearly Total		\$13,823.55	\$1,344	\$15,167.55

2" ENT CHARGES BASED ON TRUXTON PROPOSED RATES (2012 WATER USAGE)

	2" Ent	Truxton Proposed Rates			Usage Charge	Totals
January	0	0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total		\$0.00	\$112	\$112.00
February	37,000	37	\$1.51	\$55.87		
		0	\$2.50	\$0.00		
		Monthly Total		\$55.87	\$112	\$167.87
March	3,700	3.7	\$1.51	\$5.59		
		0	\$2.50	\$0.00		
		Monthly Total		\$5.59	\$112	\$117.59
April	125,000	80	\$1.51	\$120.80		
		45	\$2.50	\$112.50		
		Monthly Total		\$233.30	\$112	\$345.30
May	197,000	80	\$1.51	\$120.80		
		117	\$2.50	\$292.50		
		Monthly Total		\$413.30	\$112	\$525.30
June	127,000	80	\$1.51	\$120.80		
		47	\$2.50	\$117.50		
		Monthly Total		\$238.30	\$112	\$350.30
July	273,000	80	\$1.51	\$120.80		
		193	\$2.50	\$482.50		
		Monthly Total		\$603.30	\$112	\$715.30
August	136,000	80	\$1.51	\$120.80		
		56	\$2.50	\$140.00		
		Monthly Total		\$260.80	\$112	\$372.80
September	112,000	80	\$1.51	\$120.80		
		32	\$2.50	\$80.00		
		Monthly Total		\$200.80	\$112	\$312.80
October	6,000	6	\$1.51	\$9.06		
		0	\$2.50	\$0.00		
		Monthly Total		\$9.06	\$112	\$121.06
November	22,000	22	\$1.51	\$33.22		
		0	\$2.50	\$0.00		
		Monthly Total		\$33.22	\$112	\$145.22
December	6,300	0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total		\$0.00	\$112	\$112.00
		Yearly Total		\$2,053.54	\$1,344	\$3,397.54

3/4" OLE CHARGES BASED ON TRUXTON PROPOSED RATES (2012 WATER USAGE)

	3/4" Ole	Truxton Proposed Rates			Usage Charge	Totals
January	0	0	\$1.00	\$0.00		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$14.00	\$14.00
February	0	0	\$1.00	\$0.00		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$14.00	\$14.00
March	0	0	\$1.00	\$0.00		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$14	\$14.00
April	0	0	\$1.00	\$0.00		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$14.00	\$14.00
May	786	0.786	\$1.00	\$0.79		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$0.79	\$14.79
June	670	0.67	\$1.00	\$0.67		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$0.67	\$14.67
July	1,073	1.073	\$1.00	\$1.07		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$1.07	\$15.07
August	683	0.683	\$1.00	\$0.68		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$0.68	\$14.68
September	581	0.581	\$1.00	\$0.58		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$0.58	\$14.58
October	1,166	1.166	\$1.00	\$1.17		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$1.17	\$15.17
November	0	0	\$1.00	\$0.00		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$0.00	\$14.00
December	0	0	\$1.00	\$0.00		
		0	\$1.51	\$0.00		
		0	\$2.50	\$0.00		
		Monthly Total			\$0.00	\$14.00
		Yearly Total			\$4.96	\$172.96

TOTAL CHARGES BASED ON EXISTING VALLE VISTA RATES (2012 WATER USAGE)

	Usage for All Meters	Valle Vista Existing/Proposed Rates		Usage Charge for All Meters	Totals
January	1,556,100	1556.1	\$1.70	\$2,645.37	
		0	\$1.90	\$0.00	
		Monthly Total			
February	4,434,300	4434.3	\$1.70	\$7,538.31	\$3,847.87
		0	\$1.90	\$0.00	
		Monthly Total			
March	6,825,400	6825.4	\$1.70	\$11,603.18	\$8,740.81
		0	\$1.90	\$0.00	
		Monthly Total			
April	8,171,600	8171.6	\$1.70	\$13,891.72	\$12,805.68
		0	\$1.90	\$0.00	
		Monthly Total			
May	17,258,086	15,000	\$1.70	\$25,500.00	\$15,094.22
		2,258	\$1.90	\$4,290.36	
		Monthly Total			
June	24,089,070	15,000	\$1.70	\$25,500.00	\$30,992.86
		9,089	\$1.90	\$17,269.23	
		Monthly Total			
July	20,332,873	15,000	\$1.70	\$25,500.00	\$43,971.73
		5,333	\$1.90	\$10,132.46	
		Monthly Total			
August	17,877,283	15,000	\$1.70	\$25,500.00	\$36,834.96
		2,877	\$1.90	\$5,466.84	
		Monthly Total			
September	15,129,381	15,000	\$1.70	\$25,500.00	\$32,169.34
		129	\$2.50	\$323.45	
		Monthly Total			
October	16,109,866	15,000	\$1.70	\$25,500.00	\$27,025.95
		1,110	\$1.90	\$2,108.75	
		Monthly Total			
November	4,920,500	4920.5	\$1.70	\$8,364.85	\$28,811.25
		0	\$1.90	\$0.00	
		Monthly Total			
December	2,277,400	2277.4	\$1.70	\$3,871.58	\$9,567.35
		0	\$1.90	\$0.00	
		Monthly Total			
		Yearly Total			
				\$3,871.58	\$5,074.08
				\$14,430.00	\$254,936.10

EXHIBIT B

Valle Vista Water Usage (in gallons)

	Main	P&P	AUX	ENT	OLE	Total Usage
2012						
January	1,547,300	8,800	0	0	0	1,556,100
February	4,263,500	133,800	0	37,000	0	4,434,300
March	6,652,800	168,900	0	3,700	1	6,825,401
April	7,799,800	246,600	200	125,000	0	8,171,600
May	11,012,100	481,700	5,566,500	197,000	786	17,258,086
June	14,308,600	901,800	8,751,000	127,000	670	24,089,070
July	11,984,400	965,500	7,108,900	273,000	1,073	20,332,873
August	13,097,700	955,000	3,687,900	136,000	683	17,877,283
September	13,651,000	811,400	554,400	112,000	581	15,129,381
October	14,480,100	1,014,800	607,800	6,000	1,166	16,109,866
November	4,741,400	157,100	0	22,000	0	4,920,500
December	2,271,100	6,300	0	0	0	2,277,400
Totals	105,809,800	5,851,700	26,276,700	1,038,700	4,960	138,981,860
2013						
January	1,646,100	300	0	0	0	1,646,400
February	1,699,500	22,000	0	0	0	1,721,500
March	4,894,000	119,100	0	0	347	5,013,447
April	10,746,900	264,200	146,900	0	632	11,158,632
May	16,157,300	388,500	108,900	27,000	942	16,682,642
June	15,202,800	728,500	5,276,100	9,000	216	21,216,616
July	16,839,300	756,600	4,977,300	4,000	856	22,578,056
August	15,512,200	701,000	4,646,100	0	441	20,859,741
September	6,564,700	239,900	751,500	0	0	7,556,100
October	12,669,100	298,800	0	6,000	0	12,973,900
November						
December						
Totals	101,931,900	3,518,900	15,906,800	46,000	3,434	121,407,034